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Attorneys for Defendants  
 ONIKA TANYA MIRAJ AND HARAJUKU BARBIE MUSIC, LLC

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

JULIUS JOHNSON, an individual,  
 Plaintiff,

vs.

ONIKA TANYA MARAJ P/K/A NICK  
 MINAJ, in individual; UNIVERSAL MUSIC  
 GROUP, INC., a Delaware corporation;  
 SONGS OF UNIVERSAL, INC., a  
 California corporation; MICHAEL LEN  
 WILLIAMS II, P/K/A MIKE WILL MADE  
 IT, an individual; KAZARION FOWLER  
 PKA SKOOLY, an individual; MONEY  
 MACK MUSIC, INC., a Louisiana  
 corporation; HARAJUKU BARBIE MUSIC,  
 LLC, a Delaware limited liability company;  
 ESTHER RENAY DEAN P/K/A ESTHER  
 DEAN, an individual; MARCUS BELL, an  
 individual; SOUNDS FROM  
 EARDRUMMERS LLC, a Georgia  
 Corporation; WB MUSIC CORP., a  
 Delaware Corporation; DAT DAMN DEAN;  
 and DOES 1-10, inclusive.

Defendants.

CASE NO. 2:23-cv-05061-PA-  
 AFM  
**ONIKA TANYA MIRAJ AND  
 HARAJUKU BARBIE  
 MUSIC, LLC'S NOTICE OF  
 JOINDER TO MOTION TO  
 DISMISS FILED BY  
 DEFENDANTS  
 MICHAEL LEN WILLIAMS,  
 II; SOUNDS FROM  
 EARDRUMMERS, LLC; W  
 CHAPPELL MUSIC CORP  
 F/K/A WB MUSIC CORP.**

Honorable Percy Anderson

Date: November 6, 2023  
 Time: 1:30 p.m.  
 Place: Courtroom 9A

1 TO THE COURT, THE PARTIES, AND TO THEIR ATTORNEYS OF  
2 RECORD:

3 PLEASE TAKE NOTICE THAT Defendants Onika Tanya Miraj and  
4 Harajuku Barbie Music, LLC (“Joining Defendants”) hereby move to join in  
5 Defendants Michael Len Williams, II; Sounds From Eardrums, LLC; W  
6 Chappell Music Corp f/k/a WB Music Corp. (“Moving Defendants”)’s Motion to  
7 Dismiss Plaintiff’s Complaint filed in the above-entitled action on October 5, 2023.  
8 (ECF No. 38.)

9 Joining Defendants move to join in each argument asserted by Moving  
10 Defendants in their motion to dismiss, all of which apply equally to Joining  
11 Defendants: (1) The complaint is an impermissible “shotgun pleading” in violation  
12 of Fed. R. Civ. P. 8; (2) The complaint improperly alleges direct, vicarious, and  
13 contributory copyright infringement against all Defendants; (3) The complaint fails  
14 to plausibly allege direct infringement due to (a) failure to allege copying; (b)  
15 failure to allege ownership; (c) failure to allege access; and (d) failure to allege  
16 striking similarity; (4) Causes of action 5 through 8 are preempted; and (5) The  
17 complaint fails to allege conversion.

18 For the reasons identified by Moving Defendants in the motion to dismiss,  
19 the Complaint should be dismissed in its entirety with prejudice as to Joining  
20 Defendants.

21 Dated: October 5, 2023

GORDON REES SCULLY  
MANSUKHANI, LLP

22  
23 By: /s/ Susan B. Meyer

24 Mark S. Posard

25 Susan B. Meyer

26 Attorneys for Defendants

27 Onika Tanya Miraj and Harajuku  
28 Barbie Music, LLC